

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

COLLECTANEA J. LIMITED,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No. 24-cv-07080

Judge Andrea R. Wood

**Magistrate Judge Jeannice W.
Appenteng**

PLAINTIFF’S MOTION TO AMEND DEFAULT JUDGMENT ORDER [DOC. 89]

Plaintiff Collectanea J. Limited (“Plaintiff”), by and through its undersigned counsel, hereby respectfully requests the Court to Amend the Default Judgment Order [Doc. 89] entered on October 27, 2025. In support of its request, Plaintiff submits the following:

Relevant Background and Procedural History

1. On April 25, 2025, Plaintiff filed its Motion for Entry of Default and Default Judgment (“Plaintiff’s Motion for Default”). [Doc. 74].
2. On September 16, 2025, Plaintiff submitted a Proposed Default Judgment Order to chambers. A true and correct copy of the Proposed Default Judgment Order is attached hereto as Exhibit 1.
3. On October 27, 2025, the Court entered a Minute Order granting Plaintiff’s Motion. [Doc. 88]. In its Order, the Court set out its intended award stating “the Court awards Plaintiff \$75,000 per Defaulting Defendant for trademark infringement and \$75,000 for copyright infringement. The Court finds these damages awards proportionate to the harm caused,

within the statutory permitted amount, and sufficient to account for the willful nature of the defendants' infringement." [Doc. 88].

4. The Default Judgment Order [Doc. 89] at Paragraph 4 states:

Pursuant to 15 U.S.C. § 1117(c)(2) and 17 U.S.C. § 504(c), Plaintiff is awarded statutory damages from each of the Defaulting Defendants in the amount of one hundred thousand dollars (\$75,000) for willful trademark infringement and fifty thousand dollars (\$75,000) for willful copyright infringement.

5. Plaintiff now respectfully requests that this Court amend its Order granting Plaintiff's Motion to Amend the Default Judgment Order [Doc. 89] at Paragraph 4 to accurately reflect the damages amount awarded in the October 27, 2025 Minute Order. [Doc. 88].

Argument

6. Corrections made under Rule 60(a) apply to all clerical errors, whether important or trivial. *United States v. Griffin*, 782 F.2d 1393, 1397 (7th Cir. 1986).

7. A clerical mistake is a mistake made "in translation of the original meaning of the judgment." *United States v. Cotton*, 235 F. Supp. 2d 989, 990 (E.D. Wis. 2002) (quoting *United States v. Griffin*, 782 F.2d 1393, 1398 (7th Cir. 1986)).

8. "Motions to correct clerical errors may be brought at any time prior to the docketing of an appeal." *Wesco Prods. Co. v. Alloy Auto. Co.*, 880 F.2d 981, 983 (7th Cir. 1989).

9. Plaintiff's Motion seeks to correct a clerical error.

10. The Court's Order [Doc. 88] awarded Plaintiff \$75,000 in damages for trademark and copyright infringement. However the Default Judgment Order [Doc. 89] awarded Plaintiff "one hundred thousand dollars (\$75,000) for willful trademark infringement and fifty thousand dollars (\$75,000) for willful copyright infringement."

11. This inconsistency appears to be a mistake made "in translation of the original meaning of the judgment." *Griffin*, 782 F.2d at 1398. Thus it is a clerical error.

12. As this is a clerical error, the Court has the power to amend the Default Judgment Order [Doc. 89] pursuant to Rule 60.

13. Plaintiff's Motion is timely because an appeal has not been filed.

Prayer for Relief

Plaintiff respectfully requests that the Court:

1) Enter an Amended Order stating:

Pursuant to 15 U.S.C. § 1117(c)(2) and 17 U.S.C. § 504(c), Plaintiff is awarded statutory damages from each of the Defaulting Defendants in the amount of seventy-five thousand dollars (\$75,000) for willful trademark infringement and seventy-five thousand dollars (\$75,000) for willful copyright infringement.

2) Any other relief that the Court deems proper and just.

Respectfully submitted on this 22nd of December, 2025.

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